ExxonMobil Chemical Company
11675 Scotland-Zachary Highway
20. Box 1607

Baton Rouge, Louisiana 70821-1607 225 977 6201 Telephone 225 977 6482 Facsimile Plant Manager Opy to Almin & Johnston Baton Rouge Plastics Plant

ExonMobil
Chemical

March 1, 2006

Mr. Bryan Johnston Louisiana Department of Environmental Quality Office of Environmental Services, Permits P.O. Box 4313 Baton Rouge, LA 70821-4313

Re:

Emissions Banking Annual Report Agency Interest Number 285

Dear Mr. Johnston:

Attached is the ExxonMobil Baton Rouge Plastics Plant's (BRPP) Emissions Banking annual report as required by LAC 33:III:613.B. This submittal reflects BRPP's balance based upon the Title V permit application submitted in January 2006.

In August 2001, BRPP deposited 273.08 tons as a result of the A & D Thermal Oxidizer Project. On November 20, 2001, we received a certificate for an incorrect amount deposited for this project of 232.70 tons. A subsequent meeting with you was held concerning this incorrect certificate and a request for a new one. To date, BRPP has not received a corrected certificate.

Considerable uncertainty still remains with the emissions banking program regarding the methods by which the value of emission credits is determined and the amount withdrawn for netting and offset purposes. ExxonMobil has consulted with internal legal staff, and outside environmental consultants who have discussed several issues with the DEQ. ExxonMobil will continue to research these issues until the banking requirements are fully understood. A revised annual report may be submitted at that time. The following certification is qualified based on this disclaimer.

If you have any questions regarding this submittal, please contact Ms. Erin C. Hall at (225) 977-6329.

I certify that, to the best of my knowledge, the statements and information contained in this report are true, accurate, and complete.

Sincerely

Dave A. Luecke Plant Manager

Attachment

DEO - OES 2006 MAR -8 PH 1: OS

## Department of Environmental Quality Office of Air Quality and Radiation Protection P.O. Box 82135 Baton Rouge, LA 70884-2135

(504) 765-0195

## **LOUISIANA**

## ERC BANK APPLICATION VOLATILE ORGANIC COMPOUNDS



COMPANY: _	EXXONMOBIL	CHEMICAL,	BATON ROUGE	PLASTICS	PLANT (BRPP)		
LOCATION:	LOCATION: Baton Rouge (City)			East Baton Rouge (Parish)			
	11675 Scotlan	d-Zachary (	Hwy. (Hwy. Physical Locat	19) ion)			
MAILING ADDRESS: P.O. Box 1607 (Street or P.O. Box)			Ba	Baton Rouge LA 70821 (city) (state) (Zip Code)			
	69.69 Cs deposited-TPY) 1006 missions increase/Decrease)	30	On for netting-TPY) 4.74 ble for netting-TPY)		0 ed upon for offsets-TPY) 505.97 Hable for offsets-TPY)		
69.69	ERC bank applic tons deposited i ted in January 20	ation as r s reflecte	MENTS required by d in BRPP's	LAC 33:II Title V	I, Chapter 6. renewal applicat	The ion	
		AFFECTI	D PERMIT				
Permit Numb	er: 0840-00018-V2	Faci	lity: Exxon	Mobil Cher	mical, BRPP, AI 2	<u> 285</u>	
Affected EI	Q Source ID No.(s	s): N/	'A				
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	ertify that the i tions is true and					ion	
Dave A.	Luecke (Name)	Plant	Manager (Title)	<del></del>	(225) 977-6201 (Telephone Number)		
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